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October 30, 1990

Certified Mail Return Receipt Requested  
(P 149 486 403)

Dan Gross  
Waste Management Bureau  
Nevada Division of Environmental Protection  
123 West Nye Lane  
Capitol Complex  
Carson City, NV 89710

Re: Salt Drum Removal Plan

Dear Mr. Gross,

Enclosed is our plan for removing salt drums currently in storage on the drum storage pad. This plan incorporates the wording changes suggested at our meeting on October 25, 1990.

Sincerely,

Byron B. Bradd, P.E.  
General Manager

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## SALT DRUM REMOVAL PLAN

November 1, 1990

### Background:

ETICAM currently has approximately 3,400 drums (55 gal) of byproduct salt stored on the drum storage area in the South East corner of the facility. This salt has been accumulated since April of 1987 when the facility began operation.

ETICAM has been removing salt from this pad since March of 1990 and has reduced the inventory by approximately 1,000 drums since that time.

Due to the length of storage time, and sub-quality drums believed to have been supplied in 1987 and 1988, The condition of some of these drums have deteriorated.

### Objective:

It is the objective of this plan to reduce the salt inventory to one year storage which is about 2,500 drums by November 1, 1992. This will include all hazardous waste salts and received sludges. A revised lower permitted drum storage capacity will be proposed in the Class 3 permit modification application.

It is also the objective to remove salt during this period according to the following priority:

1. Drums showing signs of leakage,
2. Drums appearing to show signs of deterioration
3. Drums with the oldest dates, except when specific batches of salt are selected for purposes of meeting Land Restriction standards, or where excessive moving of drums can be avoided.

All salt will be removed for disposal, or repackaged with 4 mil plastic liners as the situation is best handled logistically and economically; while maintaining the goal of reducing the inventory to one year storage in compatible containers.

Schedule:

The scheduled quantity of salt removed will vary during the seasons; lower rates during cold weather due to a number of potential conditions. Salt residue becomes "hard as a rock" when frozen, and requires the drum to be cut from the block of salt. Transportation delays can result from snow storms. The receiving landfill may have difficulty stabilizing the material during severe cold spells. Additionally leakage rates have been minimal during cold weather. Based on this, the following schedule is proposed:

<u>Dates</u>	<u>Removal Rate</u>	<u>Total Removed</u>
November, 1990 thru March, 1991	100 drums per month	500
April, 1991 thru November, 1991	150 drums per month	1,200
December, 1991 thru March, 1992	125 drums per month	500
April, 1992 thru October, 1992	150 drums per month	1,200
	-----	
	Total	3,400

Note that during this period, ETICAM will be producing new salt at a rate of 200 drums per month. This material will be shipped off site most of the time, however during the second year of removal, new salt may be placed into storage since the total inventory will be maintained below 2,500 drums. New salt drums will be identified by the storage date in addition to the generation date, and segregated from old salt drums.

Volume Equivalents:

For the purpose of this plan and storage volumes, the following conversions will be used:

Each drum contains a maximum of 55 gallons  
(0.27 cu yds)

One cubic yard is equivalent to 3.67 drums

**Received Solids Storage:**

80 cubic yards is equivalent to 294 drums, and bulk bags or boxes will vary in size, therefore must be measured to determine the yardage. Each such container will be measured and the equivalent yardage marked on the container for volume accounting purposes.